

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ DELTA, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY,  
INC., COMMSCOPE, INC., ARRIS US  
HOLDINGS, INC., ARRIS SOLUTIONS,  
INC., ARRIS TECHNOLOGY, INC., and  
ARRIS ENTERPRISES, LLC,

*Defendants.*

Civil Action No.: 2:21-cv-310

**REPLY DECLARATION OF ANDREW S. ONG IN SUPPORT OF DEFENDANTS'  
OPPOSED MOTION TO TRANSFER VENUE TO THE DISTRICT OF DELAWARE**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.
2. Attached hereto as Exhibit 18 is a true and correct copy of the cover pleading for TQ Delta's Final Claim Charts in the *2Wire* case, dated July 2, 2018.
3. Attached hereto as Exhibit 19 is a true and correct copy of the cover pleading for TQ Delta's Disclosure of Asserted Claims and Infringement Contentions in this case, dated November 4, 2021.
4. Attached hereto as Exhibit 20 is a true and correct copy of TQ Delta's claim chart against CommScope for the asserted claims of U.S. Patent No. 8,462,835 (the "835 Patent").

5. Attached hereto as Exhibit 21 is a true and correct copy of TQ Delta's claim chart in the *2Wire* case for claims of the '835 Patent.

6. Attached hereto as Exhibit 22 is a true and correct copy of the Claim Construction Order for Family 9 Patents, filed at D.I. 397 in *ADTRAN, Inc. v. TQ Delta, LLC*, No. 1:15-cv-00121-RGA.

7. Attached hereto as Exhibit 23 is a true and correct copy of the Claim Construction Order for Family 10 Patent, filed at D.I. 390 in *ADTRAN, Inc. v. TQ Delta, LLC*, No. 1:15-cv-00121-RGA.

8. Attached hereto as Exhibit 24 is a true and correct copy of the Claim Construction Order for the Family 6 Patents, filed at D.I. 540 in *TQ Delta, LLC v. 2Wire, Inc.*, No. 1:13-cv-01835-RGA.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: February 25, 2022

By: /s/ Andrew S. Ong  
Andrew S. Ong